0022

28 November 1997

Dr. Chris Servheen
Bitterroot Grizzly Bear EIS
P.O. Box 5127
Missoula, MT 59806

Friends of the Bitterroot
P.O. Box 442
Hamilton, MT 59840

COMMENTS ON GRIZZLY BEAR RECOVERY IN THE BITTERROOT ECOSYSTEM DRAFT ENVIRONMENTAL IMPACT STATEMENT

1 Friends of the Bitterroot strongly supports the greatest possible protection of grizzly bear habitat in roadless areas and linkage corridors surrounding the Greater Salmon-Selway Ecosystem. The benefits of preserving these wildlands will be measured in enhanced wildlife and fisheries resources, increased protection of critically important headwater sources of clean, fresh water, and a combination of unmatched recreation and wildland values.

These objectives are essentially met in the land protection and reclamation provisions of the Conservation Biology Alternative, much of which was incorporated into the DEIS as Alternative 4. Reestablishment of a viable grizzly bear population can occur within this habitat preservation program subject to scientifically-based information from a committee of scientists. Need for future augmentation of the grizzly population will be determined on the basis of this scientific information, with implementation accomplished by appropriate federal and state wildlife and public land agencies. In the interim, the grizzly must retain its full protection as a threatened species under the provisions of the Endangered Species Act.

At its most fundamental level, the EIS MUST be guided by the constraints of grizzly bear biology: to do otherwise is to violate the very premise of recovery. Thus, it must rely on the BEST available science in delineating the preferred alternative. Unfortunately, the USF&WS has sought a political compromise which sacrifices the dictates of biology, and thus the Salmon-Selway grizzly on the altar of short-sighted expedience. When reading through the DEIS, the information points conclusively toward Alternative 4 as the BEST biological way to recover the Salmon-Selway grizzly, with some key addenda. Nevertheless, the USF&WS has ignored this information. In the final EIS, the USF&WS must correct the most important flaws in the DEIS which are listed below.

HABITAT PROTECTION

"Habitat loss and excessive human-caused mortality have reduced numbers of this species from estimates of 50,000 prior to European settlement, to 800-1000 grizzly bears that currently exist on approximately 2 percent of their historic range in the lower 48 states." (xli; 1-3; 1-5;)

Given this statement, it is ludicrous that the government's preferred alternative would not protect one acre of habitat to

ensure the bear's survival, unless one knows that the timber industry submitted this plan--the Resource Organization on Timber Supply (ROOTS) proposal.

"The ultimate goal of the plan is the removal of the grizzly bear from threatened status."(xli)--Is this by extinction or recovery?

"Wildlife species, like grizzly bear, are most vulnerable when confined to small portions of the historical range and limited to a few, small populations. Expansion of the range of the species will increase the number of bears within the lower 48 states and increase habitat size and extent, and further the conservation of the species."(1-3) The preferred alternative violates this statement on all counts. It precludes the implementation of linkage corridors; it establishes a small, isolated population; and it does nothing to increase habitat size and extent.

2 DEIS clams that habitat, by including the BE will increase by 10,000 square miles (1-4): only half of that is currently protected as wilderness, and Alt. 1 fails to protect any more. How can unprotected habitat be factored into recovery plans, especially when no formal Section 7 consultation will be required with the preferred alternative?

"...For grizzly bears to survive in the lower 48 states, each additional population with potential linkage to other populations increases the probability for survival."(1-5). Alt. 1 provides for NO linkage corridors, and in fact precludes them by designating the Bitterroot population as experimental, non-essential, a population which by definition must be geographically isolated from all other populations.

"The mission of the US Fish & Wildlife Service is to conserve, protect, and enhance fish and wildlife and their habitats ..." (1-9). The preferred alternative does nothing to validate this mission statement.

3 The federal government is bound by certain treaties in reference to protecting species, including the Convention on Nature Protection & Wildlife Preservation in the Western Hemisphere and CITIES, which "provide clear mandates for identifying and protecting important habitats and ecosystems..."(1-11,12). How does the preferred alternative address this?

4 USF&WS was recently forced by the courts to study habitat-based criteria for delisting the grizzly which it ignored when seeking the delisting of the Yellowstone population. The outcome was a workshop held in Bozeman on June 17, 1997, at which the overwhelming testimony upheld the importance of maintaining road densities at less that .25 miles per sq. mile; the necessity of linkage corridors between populations of different ecosystems; and the need for the protection of unprotected habitat vital to the bears' survival. The preferred alternative ignores all of these recommendations. Does the USF&WS plan to incorporate the

information provided at this workshop into the final EIS?

5 "Together these areas [the roadless, wilderness, and NF lands contiguous to the 5,785 sq. mi. recovery area] are of sufficient size to allow for grizzly bear recovery" (2-15). Thus the DEIS recognizes that by itself, the recovery area in its preferred alternative is TOO SMALL, but opts NOT to protect those contiguous areas that are essential for recovery.

"The key to recovery in the BE would likely be due to effective management including limitation of human-caused mortality rather than quantity of quality of habitat" (2-16). This statement is duplicitous and contradicts what the DEIS stated in the introduction--"Habitat loss and human-caused mortality have reduced numbers..." (xli). These two issues are very closely linked. Roads fragment habitat and significantly increase bear mortality. To separate the two is ludicrous. Furthermore, the Grizzly Bear Recovery Plan of 1993 states " Roads probably pose the most imminent threat to grizzly recovery today...The management of roads is the most powerful tool available to balance the needs of bears and all other wildlife with the activities of humans...Any unroaded land represents important and unique opportunities...Management should seek to maintain these area as unroaded...."

Mace and Manley (1993) found that grizzly bears avoided or underutilized habitat with open road densities greater than 1 mi./sq.mi. or total road densities above 2 mi./sq.mi., and that sow grizzlies with cubs select for roadless habitat. Kasworm and Manley (1991) found that grizzly bears used habitat within 914 meters of open roads and 122 meters of a trail less than expected. Aune and Kasworm (1989) found that 63% of known human-caused grizzly bear mortalities on the Rocky Mountain Front occurred within 1 km of a road, including 10 of 11 known female grizzly deaths. Horejsi (1993) demonstrated that even 1 mi of road per sq. mi. decreased grizzly habitat effectiveness by 70%. Finally, Mattson and Knight (1991) found roads are the GREATEST factor in grizzly mortality, and that even secondary roads in the Yellowstone Ecosystem increased the grizzly mortality risk by five times over roadless backcountry. Currently "national forest lands within the PAA contain about 26,164 miles of system roads.... Most roads have been developed as a direct result of timber harvest" (3-27). Further roading will decrease habitat effectiveness to ineffectual levels, precluding any meaningful attempt to recover the grizzly. Nonetheless, the preferred alternative states that where road densities exceed those recommended for fish & wildlife, closures would NOT result solely for the grizzly bear: road densities on the Clearwater and Nez Perce NFs are assumed to be adequate for grizzly bear recovery (despite the fact that the Clearwater NF "has plans to develop unroaded/essentially undeveloped areas (6-91-92); does not foresee any alterations to mineral extraction due to the grizzly; and that the CMC would "assure that resource extraction activities would be maintained." The USF&WS thus ignored the

best available science in choosing its preferred alternative to ensure the backing of the extractive industries. This leads one to question the USF&WS's commitment to both the bears and the STATED purpose of recovery using the BEST available science. Road densities, where they exist, MUST be maintained at less than .25 miles/sq. mi..

6 We are told (3-18) that open road densities within the non-wilderness PAA are .58 mi./sq.mi., with total road densities of 1.32 mi./sq.mi.. Similarly, we see that open trail densities in the non-wilderness PAA are .38 mi./sq.mi., and total trail densities equal .75 mi./sq.mi.. First it appears that both open and total densities are reported as a simple average across the entire PAA. If so, this is a discredited technique which tends to mask areas of excessive road densities. The "moving windows" technique is the current best available method, and must be used in the FEIS to give an accurate picture of actual road densities. Second, only half the "trail" miles are currently closed to motorized use, thus essentially roads. Finally, there is no description of high use trails and their extent, which causes grizzlies to underutilize habitat in these areas.

7 Over the last several years numerous conservationists, agency and independent scientists have acknowledged that some of the best grizzly habitat lies north of the Lochsa river, including the proposed wilderness around Mallard-Larkin and the Great Burn. In addition, a report to the Bitterroot Technical Review Team (Davis and Butterfield, 1991) specifically included this region in an analysis of grizzly bear habitat suitability in the BEA. By dropping this vital area from inclusion in the preferred alternative demonstrates that the USF&WS has chosen to ignore the biological realities of grizzly recovery, and resource extraction will receive priority over the inconveniences of sound science.

8 USF&WS concedes that the "soils throughout the area are characterized predominantly by the Idaho batholith, a highly erosive and course-grained [sic] granite" (3-10). This fact alone should warrant that these lands be protected from roading, which speeds erosion, further choking our streams with sediment.

"A primary consideration in delineation of the BEA was to include USFS management areas with minimal road densities that provide quality grizzly bear habitat" (3-18). Without the protection alternative 4 provides for these lands, this consideration is meaningless.

PROPOSED RULE 10(j), ESTABLISHMENT OF AN EXPERIMENTAL, NON-ESSENTIAL POPULATION DESIGNATION

USF&WS contends that an experimental, non-essential population designation will address local concerns by giving management authorities "greater flexibility."(2-4) Greater flexibility can be translated as more dead bears, especially in the hands of a

politically appointed management committee. The purpose of the ESA is to recover threatened and endangered species for the benefit of ALL americans, not just a local population. This designation will not win converts from those opposed to recovery. It might make things politically easier, but not biologically, and meeting the requirements of sound biology is the ONLY way to achieve the ultimate goal stated on page xli.

9 "Because nonessential populations are treated under Section 7 as proposed species, federal agencies must only confer with the USF&WS on activities that the agencies believe might jeopardize the species. Moreover, the agencies would be under no obligation under Section 7(a)(2) to avoid actions likely to jeopardize the species" (2-17). Habitat degradation, referred to time and again in the DEIS as a significant factor in the demise of the grizzly will accelerate under an experimental, non-essential designation by removing the requirement of the ESA mandating formal Section 7 consultation with the USF&WS to ensure activities by the Forest Service such as logging, mining, burning, and road-building will not adversely affect recovery. The involvement of the USF&WS on activities "with potential impacts on roadless areas and other habitat needed for full recovery...is mandated by Federal Law."(1-23) Unfortunately by implementing the non-essential, experimental designation, USF&WS abrogates its responsibilities under the law by waving any requirement for formal Section 7 consultation. By trying to maintain "land management flexibility" USF&WS is potentially sacrificing necessary habitat which is the only way bears will survive in the Greater Salmon-Selway. Moreover, allowing other agencies to determine for themselves if a proposed action would harm recovery, those same agencies are under no obligation to refrain from those activities they deem harmful to recovery (2-17). Does the USF&WS have a commitment to recover the bear or not?

10 Moreover, in order to even be considered for experimental, non-essential status, the recovery population must be physically and geographically separate from all other populations. The Salmon-Selway Ecosystem is only 40 air miles from the Cabinet-Yaak grizzly population; there has been documentation of a radio-collared bear from the Cabinet-Yaak moving south and establishing a den in the Salmon-Selway; and there is evidence (chosen to be ignored by USF&WS for obvious reasons) that a small population of grizzlies inhabits the recovery area. In the DEIS it is conceded that "small numbers of grizzly bears and mountain caribou occur in the idaho panhandle just north of the PAA" (3-11). This violates the geographical separation required for non-essential, experimental designation. For any and/or all these reasons, the request to designate the population experimental, non-essential must be denied.

11 "Linkage zone analysis and management is ongoing as part of the Grizzly Bear Recovery Plan" (2-15). However, the preferred alternative rejects the very idea of linkage zones in designating the bear population in the Salmon-Selway as non-essential.

experimental. This designation thus contradicts the Grizzly Recovery Plan. The two concepts are incompatible, and unless USF&WS's objective is to found a temporary zoo, with extinction as the inevitable result, in the Salmon-Selway the recovery effort must incorporate corridors to link this population with others in the Northern Rockies; to do otherwise is to violate the 10(j) mandate that all actions "must lead to the recovery of the species."

11

USF&WS contradicts itself in arguing for an experimental, non-essential population designation contending that the recovery effort would increase genetic diversity and potentially increase genetic interchange among populations "if bears immigrate or emigrate" (6-107). By definition the experimental, non-essential designation can only be for an ISOLATED population. Thus, in order to achieve the genetic interchange which USF&WS apparently supports, these bears MUST retain their full protected status under the ESA.

In an effort to gain support for the experimental, non essential status, USF&WS has purposely given the concept of section 7 consultation an ominous slant. Even in the no action alternative, it warns of potential land use restrictions and trail closures (2-24). This is shameful.

The projections for grizzly population growth for the Salmon-Selway (2-11) is seriously flawed by the fact that the source data comes from the YE and the NCDE, both of which have bears with the full protection of the ESA. By designating the bears in the Salmon-Selway as non-essential, experimental, they will

12

definitely experience a higher mortality that those in the YE or NCDE. One need only look to those wolves which were denied the full protection of the ESA. Their mortality rate was criminal, due in large measure to the loss of protection. What happens when that mortality occurs to a species which under the best of circumstances only reproduces every third year?

There exists reliable evidence that a small population of grizzlies exists in the Salmon-Selway. This invalidates any attempt to institute the non-essential, experimental population status. USF&WS admits that it does not have information on the number of all species in all units of the recovery area. It has NO post-harvest numbers for moose (3-13). Yet it nevertheless states conclusively that no grizzlies inhabit the area. How is that possible? What would constitute conclusive evidence for the presence of grizzlies? A dead bear? "Kunkel (1991) concluded that the results of [his & Servheen] two year effort [to find grizzlies] indicated that if grizzly bears occurred in the North Fork Clearwater drainage, the existed in extremely low numbers. The USF&WS has reviewed this [sic] data and concluded no grizzly

13

bears inhabit the area" (3-15). This DESPITE the fact that Kunkel AND Servheen "cautioned that their efforts did not confirm the absence of bears in the BE because of the small area surveyed and low camera density (1/110 sq. mi.) used" (3-15). 1/110

sq.mi.!!

13 The Melquist analysis (1985) of 88 reports of grizzlies in the Salmon-Selway found that 14 (16%) were "probable" and 37 (42%) "highly possible." The USF&WS cannot continue to ignore these results and maintain its credibility.

In the interest of fairness, perhaps USF&WS should also note the DISadvantages to designating any recovery population "non-essential, experimental (6-104-107), such as increased bear mortality; loss of protected status for any bears that currently reside in or may migrate to the Salmon-Selway; significantly diminished chances of a successful recovery, particularly given the very low reproductive rates of grizzly bears; as the wolf reintroduction SHOULD have taught USF&WS, removing full protection will NOT placate opponents of grizzly recovery.

14 The proposed rule change stipulates that the CMC would determine if the reintroduction was successful after a minimum period of 10 years (6-116), when USF&WS estimates it will probably take more than 100 years. How can 10 years be a benchmark, unless the agency was not committed to real recovery, but a political show?

15 By asserting that any grizzly bears found within the experimental area, including any bears that move in from outside the experimental area, will be classified as part of the experimental population (6-118), USF&WS implicitly acknowledges that the Salmon-Selway is NOT geographically isolated from other grizzly populations. As such the proposed rule would be illegal.

Most troubling is the fact that USF&WS is seeking, at this early stage of the recovery process, comments on the proposed rule to list the recovery population as experimental, nonessential. This leads one to conclude that the decision on which plan to implement has already been made, instead of the required NEPA process to determine the best alternative to choose. Only AFTER the record of decision has been signed, should comment be solicited on the proposed rule change.

"CITIZEN MANAGEMENT COMMITTEE"

16 Once again the USF&WS is seeking to absolve itself from responsibility for recovering the grizzly.(2-8,9). By placing management in the hands of local citizens who may or may not have any interest in recovering the bear, the agency fails to act in a way that is in concert with recovery. It has been demonstrated time and again that gov. Batt of Idaho is vehemently opposed to any recovery plan, but nevertheless, USF&WS gives him the opportunity to appoint seven of the committee's fifteen members. The committee is given a vast amount of discretion in its actions, provided its actions "will lead to recovery." However, once it is determined that its actions are NOT leading to recovery, the Secretary of the Interior allows it an additional six months to further harm the recovery effort, before the

16 Secretary would take over the committee's role. Moreover, it is not mandated in the DEIS that the Secretary MUST resume management responsibility if the CMC fails to make decisions based on the best science of grizzly biology. This is nothing but a legal shell-game. If the CMC takes action that is illegal, which body is legally responsible? The CMC? The USF&WS? Yhe Secretary of the Interior?

The CMC makeup is characteristically vague. Aside from representatives from state and federal Fish & wildlife departments, there is NO requirement to nominate anyone who is an expert on grizzlies, wildlife recovery plans, population viability, or basic biology. Moreover, there is no provision for the Secretary of the Interior to turn down unqualified nominees. The entire concept of the CMC is based not on sound science, but on political expedience; a bad omen for the grizzly.

17 The CMC as "defined" is very amorphous, given no concrete guidelines aside from "decisions that lead to recovery." It would have the power to make decisions, but with little or no accountability. It can act with impunity for a year or more before it MAY be stripped of its power. The result will be dead bears, wasted money, and perhaps the end of a recovery effort. Furthermore, the CMC is given sweeping authority to control roads and access management, logging, grazing, mining, oil & gas leasing, recreation, the adequacy of Forest Plans, and the life and death of bears, it has essentially been given CONTROL of national public lands. This is an unprecedented disaster. Will our national parks be next? What about foreign policy? There would be nothing wrong with establishing a Citizens ADVISORY Committee to provide USF&WS with local input, but management authority MUST remain with the Federal Government.

The DEIS requires that CMC members come from "within and adjacent to the recovery and experimental population areas." Thus, some of the region's most informed biologists and conservationists are automatically excluded, not to mention 99% of the other americans who actually OWN the land.

Establishment of a CMC will not placate local opposition. There is virtually NO support in the Bitterroot Valley or elsewhere in Idaho & Montana for the CMC--not those supporting recovery; not those opposed to recovery. Local input, yes; local control, no.

SOURCE POPULATIONS FOR TRANSPLANTED BEARS

18 Both the preferred alternative and Alternative 4 mandate that "subadult grizzly bears of both sexes would be trapped each year for 5 years...[from] southeast british Columbia, the Northern Continental Divide Ecosystem (NCDE) population.... and the Yellowstone Ecosystem(YE) population."(2-10, 2-33) BC has recently stated that its bear population may be threatened, and the NCDE and YE populations are NOT recovered. Sink/source genetics tell us that to take prime reproducing female grizzlies

18 out of threatened populations will adversely affect that population's ability to recover. Yellowstone has consistently exceeded it "mortality limits," and yet USF&WS wants to add to this mortality by removing bears from the YE for its transplant population. Furthermore, these bears will, under the preferred alternative, lose their protection under the ESA, becoming "non-essential, experimental." By using grizzlies from the YE and the NCDE, the USF&WS would not only be downlisting these bears, but would be delisting them, a clearly illegal act. Section 4(a) of the ESA lists only five criteria under which species may be listed or delisted, and this recovery proposal does NOT fit one of the five criteria.

19 The USF&WS declares that the YE and the NCDE along with Canada would provide source bears, deeming these populations "healthy" enough to supply 5 bears/year. However, any population currently listed as threatened is, by definition, not healthy, and has no "limited surplus." Furthermore, since the USF&WS's technique of counting bears was struck down by the courts as "arbitrary and capricious" (9/95), and has not been replaced to the court's satisfaction, the USF&WS has NO biologically sound count of grizzlies in either the YE or the NCDE. In addition, the suggestion that there is a limited surplus between current mortality levels and allowable mortality levels is patently false. Both Total and Female Mortality Limits have been exceeded in the YE for three consecutive years. In the NCDE, Total and Female Mortality Limits were exceeded in 1992, and Female Mortality Limits again in 1995. There has been a recent attempt by the USF&WS to play fast & loose with the numbers by calculating mortality levels as a running six-year average rather than annually--a tactic NOT done in the recovery Plan or the scientific study upon which mortality limits are based. This effort is biologically and professionally inexcusable.

Bears that die or are removed can be replaced, and of course half of those additional bears could come from the YE and NCDE, further depleting those threatened populations and delaying their recovery and eventual delisting.

The DEIS notes that "Grizzly bears relocated to the BE would likely come from areas where neither salmon nor whitebark pine are plentiful." This removes the YE as a considered source population, where whitebark pine is plentiful and vital to grizzly bear reproduction and survival.

It may well be determined by a scientific committee that no acceptable source populations exist, but by protecting habitat and establishing linkage corridors between current populations and the Greater Salmon-Selway Ecosystem that over the long term, a healthy, viable population will establish itself in the next century. We only need to give the bears an opportunity.

Servheen's own study (1992) states that "survivorship of young bears can dramatically affect population growth."(2-12) This

also works in reverse--removing young bears from threatened populations can dramatically inhibit growth in those populations from which the bears were removed.

20 USF&WS makes an apriori (and likely false) assumption that the only way to recover the grizzly in the Salmon-Selway is the active transplant of bears (3-19). By protecting habitat and establishing linkage corridors with other populations, recovery can be accomplished that is more natural, less intrusive, and thus more likely to succeed in the long term.

RESOURCE EXTRACTION

By not protecting any habitat outside of designated wilderness, there is no impediment to the extractive industries roading, logging, and mining those areas which will be critical to grizzly recovery. The DEIS declares that timber cutting is compatible with grizzly recovery. It provides road density guidelines for the Clearwater and Nez Perce national forests, but does not for the Salmon, Lolo, Bitterroot, Boise, Payette, Sawtooth, Panhandle and Challis NFs. Even secondary roads in Yellowstone presented a mortality risk five times higher than roadless areas. Thus, in order to maximize the survivorship of young bears (Servheen, 1992), roadless areas MUST be preserved.

21 "Resource extraction activities would be maintained at levels consistent with grizzly bear recovery" (2-13). Quantifiably what does that mean? Will the CMC deem Forest Plans adequate? Based on whose science? Not the vast majority of those who attended the June 17th workshop in Bozeman.

"Timber harvests have a significant effect on the physical and biological environment" (3-25). Yet USF&WS failed to address this issue in any effective way in the recovery plan. No restrictions on logging and/or associated road-building will be implemented under the preferred alternative, nor does it require any formal Section 7 consultation with the Forest Service on the effect of logging grizzly habitat.

22 "Based on the best available data (Tom Wittinger, Flathead Forest, pers. comm.), it is estimated that reductions in timber harvest on national forest lands within the PAA would be between 43 and 194 million board feet per year over the next decade if Alternative 4 grizzly bear recovery were implemented as proposed (see table 4-15)" (4-45). THIS is the best available data? A per. comm. from the Flathead? This makes this entire statement meaningless, and its incorporation in the DEIS is suspect. What RELEVANT documentation and methodology supports such a conclusion?

The Planned Allowable Sale Quantity (ASQ) used to supply the high number (194 mbf) when assessing reductions in timber harvests under Alternative 4 is worthless. This number comes from outdated Forest Plans that reflect the Forest Service's "wish

list" for board feet cut, irregardless of environmental consequences or legality. The lower number (43 mbf) is more meaningful--the actual cut in recent years (4-55).

23 The comparison in the DEIS estimating job loss from reductions in timber harvests and the jobs created in wildland restoration is slanted in an overt effort to draw support from alternative 4. A number of errors occur in the analysis (4-55-59). It assumes a constant employment rate for timber workers, when increased mechanization/automation accounts for a substantial decline in timber related jobs. Furthermore, it downplays the importance of LONG-TERM wildland restoration jobs, particularly given the mandatory nature of establishing migration corridors between ecosystems. Finally, nowhere in the DEIS was there an attempt to assess the SPECIFIC contribution of timber jobs to the overall regional economy.

PROBLEMS WITH ALTERNATIVE 4

24 No apriori number of bears should be established. Where USF&WS came up with 300-500 bears is suspicious (2-33). The Conservation Biology Alternative (CBA), from which this alternative was drafted makes no mention of the number of bears that would constitute a "recovered" population. The insertion of these numbers appears to be a tactic of the USF&WS to draw support away from this alternative by instilling fear. The number of bears should be determined by the bears themselves in how they adapt to the available habitat.

USF&WS advocates transplanting 5 bears/year for five years, to be taken from threatened populations in the NCDE and YE. This is illegal. As per the CBA, a scientific committee must determine if a source of bears exists from a healthy population, and whether bears must be relocated at all. The CBA focuses on NATURAL recovery. Only as a LAST RESORT should bears be relocated into the Salmon-Selway.

OTHER PROBLEMS WITH THE DEIS.

25 In the comparison table on page 2-44, USF&WS uses biased language in highlighting alternative 4. It states that hunting losses will total $288,700/yr. From where does this figure come? It also points to job losses from alternative 4, but fails to account for the long-term nature of the wildland reclamation jobs that will result from the implementation of this alternative. Finally, USF&WS points to black bear hunting season changes, but this will NOT happen unless the Idaho Department of Fish & Game decide to implement this change--not very likely.

26 Only HALF of the miles of trails in the ten national forests of the Salmon-Selway are currently closed to motorized vehicles. Of the ten forests, only FOUR have more miles of trail closed to motorized use, than are open (3-34). Without further

restrictions on motorized use, the habitat destruction that results will continue to impede grizzly recovery.

27 The DEIS asserts that "other industry (forestry, fisheries, mining, construction, manufacturing, other transportation and freight, wholesale trade, and federal government military enterprises) accounted for about 24.2 percent [of personal income] in 1993" (3-38). Since the preferred alternative seems intent on not "disrupting" the forestry and mining sectors of the economy for the grizzly, what SPECIFIC percentage of the local economy is provided by those TWO activities? Would protecting the remaining roadless areas from these two admittedly destructive activities really have any significant impact on the local economy, particularly when the job creation aspects of alternative 4 are factored into the equation?

28 The formula used by USF&WS to calculate livestock depredation from grizzlies is unsatisfactory (4-46). For one thing, it was developed by wolf biologists, but being applied to grizzlies, which are not nearly as mobile as wolves. Furthermore, and more fundamentally, the equation does not take into account the relative size of the various ecosystems being used to estimate predation rates.

29 The definition of a "viable population of grizzly bears" given in the DEIS (1-16, 6-12) flys in the face of accepted population genetics. The "foreseeable future" has EVERYTHING to do with POLITICS, but NOTHING to do with accepted population GENETICS. On page 1 of the Alliance for the Wild Rockies Special Report #8, citing the work of Allendorf, et al. 1991 and Shaffer 1992, long-term viability reflects a 95% or better chance of species survival FOR SEVERAL HUNDRED YEARS.

30 Given the EXTREMELY RARE incidents of grizzly inflicted injury/mortality in those ecosystems inhabited by the Great Bear, it is unconscionable that the USF&WS is attempting to gain support for its preferred alternative by hinting that without the "management flexibility" attained by designating grizzlies in the Salmon-Selway as an experimental, non-essential population, that "perhaps" the "associated risk of injury" might also rise (6-102). The correlation between the two issues suggested in the DEIS does not exist.

31 The guidelines for determining grizzly bear nuisance status are vague and thus subject to arbitrariness. For example, what constitutes "significant depredation" of livestock or "significant loss of property" (6-166-167)? The result of such ambiguous terminology will be a significant increase in bear mortalities.

CONCLUSION

The USF&WS has an opportunity to make a bold statement, to recovery the grizzly bear to its historic range in the Greater

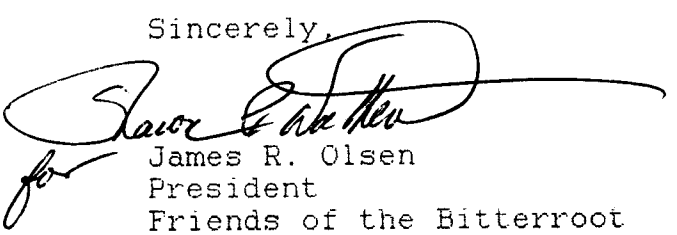
Salmon-Selway Ecosystem. The DEIS falls well short of being bold, the agency's conclusion as to its preferred alternative lacks any credible scientific foundation. In drafting the Final EIS, USF&WS must draw the obvious conclusion provided by information in the DEIS, and chose alternative 4 as its preferred alternative. It must recognize the vital importance of habitat protection, restoration, and the maintenance of all remaining roadless areas in the ecosystem. Science, not politics must fuel the recovery. A politically charged CMC will not facilitate recovery. All grizzly bears, those now residing in the Salmon-Selway, and those that migrate into the region through the vital corridors linking other grizzly populations to the Salmon-Selway must retain their full protection as a threatened species under the ESA. If, at some later date, a scientific committee determines that only by relocating bears can we repopulate the Salmon-Selway, then it will determine if any populations are healthy enough to provide source bears.

One additional note on the public hearings; The hearing marshal in charge of the public hearing in Salmon, Idaho was incompetent. He allowed a level of intimidation to occur and continue that was unacceptable. He even allowed one bear opponent to "mock-charge" a speaker who was there BY LAW offering his comments on the proposed grizzly bear recovery. The marshal also repeatedly allowed verbal and auditory disruptions and demonstrations from the hostile crowd. Anyone who attended the Salmon hearing to speak on behalf of the Great Bear could not help but feel intimidated. The ENTIRE responsibility for this rests with the inept marshal of that hearing. We believe that the comments/results from the Salmon hearing should be stricken from the record.

32

The Friends of the Bitterroot requests that the USF&WS enter these comments into the formal record to show that we support Alternative 4 provided the above-noted changes be incorporated into that alternative, and furthermore that we categorically OPPOSE the proposed rule change establishing a nonessential experimental population of Grizzly Bears in the Bitterroot Area of Idaho and Montana.

Sincerely,



James R. Olsen
President
Friends of the Bitterroot